

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Part 97 of the Commission's)	RM-10787
Amateur Service Rules to Eliminate)	
Morse code testing)	
)	

To: The Commission

COMMENT

1. I urge the Commission to REJECT the recommendations in RM-10787, which is the petition by the National Conference of Volunteer Examiner Coordinators (NCVEC) and written by Frederick O. Maia.

2. Telegraphy should remain part of the licensing structure because Morse proficiency still plays a modern role within the Amateur Radio Service. It is the second-most utilized mode and is a foundation skill for numerous other activities within the Amateur Radio Service.

3. The petitioners make wild claims with unconscionable exaggerations. The petitioners fail to cite data or references to support any of their key arguments. The petitioners' assertions do not even rise to the anecdotal level.

4. I have been an amateur radio operator since 1975, when I earned a Novice at the age of 19. *I am a Volunteer Examiner* (VE) with ARRL-VEC¹ and have served in the past with W5YI-VEC². I teach Technician and General Class licensing courses, as I have for over 20 years. I also repair and build my own equipment, and operate many modes including telegraphy, SSB, FM, VHF packet, and PSK31. I am experienced in HF and VHF emergency communications, and volunteer with the Alexandria (VA) Amateur Radio Emergency Service

¹ The American Radio Relay League Volunteer Examination Coordinator (ARRL-VEC) is sponsored by the American Radio Relay League (ARRL), Newington, CT.

² The W5YI Volunteer Examiner Coordinator (W5YI-VEC) was founded by Frederick O. Maia, former owner of W5YI-Group, Inc., Dallas, TX, and author of the NCVEC petition RM-10787.

(ARES³). I have also been active in SKYWARN⁴ and have volunteered at the Texas State Emergency Operations Center during hurricanes and floods. I have extensive experience in regional and national hurricane watch nets on HF. I participate in the 80 meter Virginia Traffic Net (telegraphy) and 75 meter Virginia Sideband Net (SSB voice supplemented with telegraphy). I am active with the Alexandria Radio Club, the Mount Vernon Amateur Radio Club, and I have been a member of the American Radio Relay League (ARRL) since 1976.

5. “Special Priority” vs. Complete Elimination. While NCVEC suggests that Morse proficiency “deserves no special priority,” by requesting its *entire* removal, they go far beyond “special priority,” and instead afford it no recognition whatsoever!

6. Telegraphy is mainstream in the Amateur Service. Telegraphy continues to be the second-most utilized mode in the Amateur Service, even though there are “more than a thousand modes and emissions.” For this reason alone, newcomers should this simple skill in order to ensure knowledge of major activities in the Amateur Service.

7. Telegraphy exams are NOT a barrier. Any suggestion of a 5 wpm barrier ignores the fact that there has been a historically unprecedented increase in upgrades since the Morse requirement was reduced to 5 word per minute (wpm) in 2000. All those upgrades -- every single one -- required candidates to have passed a Morse code exam at 5 wpm.

8. NCVEC Misses Point on Use of Computers. The petitioner claims that computers can receive telegraphy, but that is not completely accurate. Modern software still cannot read hand-sent Morse code that the human ear and brain can copy easily. The petitioner also misses the point: The elegance of telegraphy is that can be “on the fly” with the simplest equipment: no computer needed. Telegraphy and the soundcard-driven digital modes are used for different circumstances, so the NCVEC discussion on this point is comparing “apples to oranges.”

9. Amateurs do Use Telegraphy: The NCVEC states that radio amateurs rarely use telegraphy after passing their Morse exam. This is simply not true, and is easily refuted by pointing out that Morse code is the *second most popular mode*. While beginners may gravitate toward lower skilled pursuits, such as FM or SSB, many return to telegraphy later in their radio amateur careers. As I have seen from years of training new hams, many licensees continue to practice their telegraphy skills if they studied telegraphy for the examinations. Yet many Technicians never even try if they did not have a code requirement in the first place. That is not due to difficulty, but to motivation.

³ Amateur Emergency Radio Service is a volunteer organization sponsored by the ARRL.

⁴ SKYWARN is a volunteer emergency storm spotting network sponsored by the National Weather Service and through agreements with the ARRL.

10. Retain Voice Privileges as an Incentive. As NCVEC's petition points out, "most amateurs want to communicate in the voice mode." Thus they admit that the Commission's current use of access to voice modes is an effective motivation for improving skills. The Commission should continue to use the voice privileges as an incentive to upgrade to higher license classes that require further study and commitment.

20. Exams are not a Burden to VE Teams. The NCVEC claims that the CW test "requires extensive preparation and special equipment." Since when are a cassette tape and a boom box considered "special equipment?" There is no other material needed. My VE teams purchase tapes through the ARRL or W5YI VEC program. It is very easy to generate homemade exam cassettes using free software.

24. In conclusion, the NCVEC petition fails to make a case for removing the telegraphy exams. Their arguments are exaggerated and unsupported by facts. The facts themselves point to the opposite of most of the petition's assertions.

25. I urge the Commission to REJECT the NCVEC Petition.

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